ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY

RESPONSIVENESS SUMMARY
TO COMMENTS RECEIVED DURING PUBLIC NOTICE
For
Draft Air Quality Control Permit Number 1000105
Tucson Electric Power Company - Springerville Generating Station

Begin Public Notice: December 22, 1998
End Public Notice: January 24, 1999

GENERAL

Comment: *In some instances the permit specifies that certain reports "shall also be submitted to the EPA Administrator." Does it mean that where it is not so specified, the reports should be submitted to ADEQ only? It would be helpful to have such distinction either in the permit or in a guidance document.*

Response: Where it is unclear as to which agencies should recieve reports, the Compliance Section, on request, will assist TEP staff in making these determinations.

ATTACHMENT "A"

Comment 1. *Section II.A.*
This paragraph states that any permit noncompliance "constitutes a violation of the Arizona Revised Statutes." Neither the regulation cited in support of this provision, nor either of the statutes cited, provide a basis for the provision. Accordingly, the sentence should be revised to state: "Any permit noncompliance is grounds for enforcement action; . . . "

Response: The suggested change has been made.

Comment 2. *Section VII.A*
As stated in our comment #3 of September 21, 1998, TEP does not feel that submitting compliance certification twice each year would be beneficial to the agencies, the sources, and/or the environment. It only adds a burden to both the sources and the agencies.

ADEQ stated in their response of October 23, 1998 that "ADEQ has been implementing semi-annual compliance certification requirements on a consistent basis to increase oversight on the part of the upper management of the sources.ö The TEP management has always exercised, and continues to exercise, oversight over all

facilities to assure compliance with all applicable requirements. Requiring annual certification, as opposed to semi-annual, does not relieve the responsibilities of management. The compliance certification must identify any non-compliance that may have occurred going back to the previous certification. Therefore, management cannot wait until the last minute to exercise oversight, but must do so on a consistent basis.

Should repeated situations of non-compliance at a specific source arise, then the agency has the authority to require more frequent compliance certification of that source if it so desires, but should not require it uniformly. In addition, as previously commented, the submittal timeline for these compliance certifications should be extended to 60 days, but not less than 45 days after end of certification period. The certifying official must have sufficient time to perform the proper inquiries before certification of compliance. Finally, the certification period should be changed to begin with the first day of a quarter and end with the last day of another quarter so as to coincide with other record keeping and reporting periods.

Response:

- As the response of October 23, 1998 stated, ADEQ has been implementing semiannual compliance certification requirements on a consistent basis. ADEQ will continue to implement this policy.

- The permit language in Part VII.A of Attachment A has been modified as follows to specify that the compliance certifications may be submitted 45 days after the end of the certification period :

  "*Permittee shall submit a compliance certification to the Director twice each year, which describes the compliance status of the source with respect to each permit condition. The first certification shall be submitted no later than May 15th, and shall report the compliance status of the source during the period between October 1st of the previous year, and March 31st of the current year. The second certification shall be submitted no later than November 15th, and shall report the compliance status of the source during the period between April 1st and September 30th of the current year. The initial compliance certification shall reflect compliance status of the source beginning the date of permit issuance. The certification submittal deadlines may be extended by recieving written approval from the Director*

  [A.A.C. R18-2-309.2.a]"

- Compliance certification periods have been changed to coincide with quarterly reporting periods.

Comment 3. *Section VII.A.5.*
The requirement in this paragraph that compliance certifications include all instances of deviations from permit requirements appears to misapply R18-2-306(A)(5)(a). That regulation requires submittal of monitoring reports at least every six months, and

requires instances of deviations from permit requirements determined from such monitoring to be identified in the monitoring report. The regulation does not require that compliance certifications list all instances of such deviations. Such a requirement would be unworkable. Accordingly, Section VII.A.5 should be deleted.

If ADEQ's intent is that monitoring reports are to be certified and are to be submitted at the same time that semi-annual compliance certifications are submitted, a separate provision should be drafted to that effect. It should also be noted, however, that some monitoring reports, e.g., reports required under Attachment "B", Section III.D.3, require reports on a quarterly basis.

Response: The suggested change has been made. The language addressing the semi-annual deviation reports required by AAC R18-2-306(A)(5)(a) has been moved from Paragraph VII.A.5 to Part XII.B.3 of Attachment "A". If there are redundancies in reporting requirements, they will be addressed by Compliance Section policies.

Comment 4. *Section VII.A.6.*
It appears to be ADEQ's intent that progress reports pertaining to compliance schedules are to be submitted with the semi-annual compliance certification. As worded, however, this provision requires progress reports to be part of the compliance certification. Such a requirement does not have a regulatory basis and, in fact, would be unworkable. Accordingly, this provision should be deleted, and a separate provision should be drafted requiring that progress reports be submitted every six months at the same time that compliance certifications are submitted.

Response: Pursuant to A.A.C. R18-2-309.2.c.v, the Department requires the progress reports to be part of the compliance certifications. No change will be made.

Comment 5. *Section VII.B. The word "certification" should be "certifications" (grammatical correction).*

Response: The correction has been made as suggested.

Comment 6. *Section IX*
Should define reasonable time for purposes of this section.

For our Springerville Generating Station (SGS), reasonable time means anytime between the hours of 8:00 a.m. to 5:00 p.m., Monday-Thursday, except holidays. SGS is on a 4-day workweek schedule.

Response: ADEQ inspectors should have access to the premises at all times. Adding the suggested language to the permit will restrict this required access. No change will be made.

Comment 7. *Section XII.A.*
Under R18-2-101(37), "Excess emissions" means emissions of an air pollutant in excess of an emissions standard as measured by the compliance test method applicable to such emissions standard. Not all excess emissions currently reported by TEP are

measured by a reference test method. In fact, most of such reports are based on readings from CEMS and COMS, neither of which are used as direct compliance instruments. Assuming that ADEQ desires to have TEP continue to file excess emissions reports based on non-compliance monitoring instruments, it is recommended that the following sentence be added to this provision: "For purposes of reporting under this Section XII.A, the term "excess emissions" means emissions of an air pollutant in excess of an emissions standard as measured by the compliance test method applicable to such emissions standard or by use of continuous emissions monitoring systems." Inserting a provision such as the foregoing would meet ADEQ's need by providing a report regardless of whether the emissions were measured by a reference test method, COMS or CEMS, without doing violence to the definition of excess emissions as given at R18-2-101(37).

Response: Any exceedance of an emission limit as measured by use of continuous emissions monitoring systems other than reference test method falls under the purview of permit deviations. Reporting requirements for these are set forth in Section XII.B of Attachment "A". No change will be made.

Comment 8. *Section XII.A.*
The language in R18-2-310(A) concerning an affirmative defense should be added. This is important language in that it provides that the owner or operator shall have an affirmative defense if the reporting requirements of Section XII.A.3 are satisfied and the demonstration outlined in R18-2-310(A) can be made. Use of this provision has been authorized by EPA's final interim approval of Arizona's Title V Program. See 61 Federal Register 55910 (October 30, 1996). As stated by EPA: "During the interim approval period, however, ADEQ may implement its Title V program according to the regulations receiving interim approval in today's action, including the A.A.C. R18-2-310 excess emissions affirmative defense provision.ö Id. at 55914. Regardless of the fact that R18-2-310 is the subject of litigation as noted by ADEQ, permittees are entitled to its benefits so long as it is part of Arizona's permit program.

Response: As it has been discussed previously, ADEQ agrees that Permittees are currently entitled to the benefits of A.A.C. R18-2-310(A). However, ADEQ does not see the necessity to include this provision in the permit at this time. A.A.C. R18-2-310(A) can be used by the Permittee regardless of whether it is or is not included in the permit. ADEQ has good reasons for not placing this condition in the permit. One reason is that ADEQ anticipates resistance to its inclusion in the permit, from the Environmental Protection Agency (EPA). Another reason, as discussed previously, is that if the condition were included in the permit, and subsequent litigation found the "affirmative defense" provision to be invalid, the permit would have to be reopened at such time to remove A.A.C. R18-2-310(A) from the permit. This would result in significant investment of time and effort on the part of the Permittee as well as ADEQ. This would not occur if the current ADEQ policy is followed.

Comment 9. *Section XII.A.1.*
The requirement in Section XII.A.1 for excess emissions reporting based on R18-2-310 overlaps with the requirement in Section XII.C. Based on the qualification given in R18-2-310(A), language should be added to this paragraph stating that in instances

of "emergencies" the reporting requirements of Section XII.C apply.

Response: The existing language sufficiently clarifies the actions that are required under Section XII of Attachment "A". Suggested change has NOT been made.

Comment 10. *Section XII.A.3.*
For clarification purposes, reference in this paragraph to "Section XII.A" of Attachment "A" should be revised to "Section XII.A.1."

Response: The change has been made.

Comment 11. *Section XII.B.*
This requirement conflicts with and/or duplicates the reporting requirements of Sections XII.A. and C. Qualifying language should be added to make clear that reports are not required under Section XII.B if the incident to be reported is subject to either Section XII.A or C.

Response: If the Permittee complies with the reporting requirements of Part XII.A and/or Part XII.C, the reporting requirements of Paragraph XII.B.2 will be automatically met. Any redundancies in reporting requirements will be addressed by the Compliance Section through policies.

Comment 12. *Section XII.C.1.a.*
This paragraph includes a reference to meeting the "conditions of paragraph (c) of this subsection." The correct citation should be to paragraph (b).

Response: The correction has been made.

Comment 13. *Section XII.D.*
This provision should be deleted as there is no regulatory basis provided for it. It appears that this provision is being used as a requirement of general applicability. If so, in order for ADEQ to utilize such provision, it should be subject to the rulemaking process. Moreover, it is unclear how the "sequence of actions with milestones" required by the provision are to become "enforceable."

Response: Citation of A.R.S. §49-426.I.5 has been added to the condition.

Comment 14. *Section XVIII.A.*
This provision requires that performance tests be conducted during operation "at the maximum possible capacity of each unit under representative operational conditions." This terminology is ambiguous at best, and inconsistent with R18-2-312, which essentially requires that tests be conducted under "representative" conditions. ADEQ should eliminate the second sentence of this condition and revise the first sentence to read: "Performance tests shall be conducted under such conditions as the Director shall specify to the plant operator based on representative performance of the source."

We would also like to add, at the end of the paragraph, the following language:

> *"For those units subject to 40 CFR 75, the compliance test may be conducted in conjunction with the Relative Accuracy Test Audit (RATA) for SO2 and NOx, and the results of the RATA may be used for compliance purposes. For those units, the testing conditions requirements established by 40 CFR 75 and its subsequent revisions would be applicable."*

Response: The language has been revised to read as follows:

"*Performance tests shall be conducted at the <u>full load</u> of each unit under representative operational conditions unless other conditions are required by the applicable test method or in this permit.*"

ADEQ agrees that data from the RATA is of similar quality as the compliance tests, and can be used to demonstrate compliance with SIP limits. However, ADEQ is of the opinion that this can be clarified through policy issued by the ADEQ Compliance Section, and it is not necessary to to include the suggested language in the permit. Therefore, the suggested language will not been added.

Comment 15. *Section XVIII.B.*
The reference to R18-2-312(B) as the basis for the submission of a test plan is in error, as that regulation simply requires advance notice of the test to the Director. This condition should be revised to cite a correct underlying requirement for the submission of a test plan, or should be deleted.

Response: Per comment, reference to R18-2-312.B has been deleted.

Comment 16. *Section XVIII.E*
In our comments submitted September 21, 1998, we had asked that the reporting of test results be submitted 45 days after the end of the compliance test because, especially with regard to particulates, it is sometimes difficult to get results back on time to submit within 30 days.

In your response of October 23, 1998, you agreed to such a change, but the permit language has not been revised. Again, we ask that this reporting period be extended to 45 days.

Response: This change has not been made. ADEQ has been applying this policy consistently statewide. In the event that the Permittee anticipates difficulties in meeting the timeframe, the Permitte should contact the Compliance Section of the Air Quality Division at ADEQ on a case-by-case basis.

<u>ATTACHMENT "B"</u>

Comment 1. *Section I.A.1*
In our comments of September 21, 1990, we asked for the 27% exception for opacity

excess emissions as given in 40 CFR 60.45. In your response of October 23, 1998, you stated that the EPA Approval to Construct does not give such exception. There are several conditions and/or applicable regulations or standards that are not specifically mentioned in the EPA's Approval to Construct, but are nonetheless conditions applicable to the SGS. As stated in our previous comments, the Approval to Construct specifically states that "the operator shall continuously monitor equipment operation as specified in 40 CFR 60.45."

TEP feels that the 27% exclusion, as stated in our comment of September 21, 1998, should apply and should be written into the permit as it was done in the existing operating permit.

Response: Unit 1 and Unit 2 boilers at TEP-SGS are subject to 40 CFR §60.42 which gives the 27% exception for opacity excess emissions. At same time, these two boilers shall be operated under the Approval to Construct which does not give such exception for one six-minute period per hour of 27% opacity. The emission limits in the Approval to Construct are more stringent. Pursuant to EPA White Paper No.2, ADEQ is hereby streamlining the emission standards. The requested change will not be made.

Comment 2. *Section I.A.2, 3, 4*
In section I.A.1, periods of startup, shutdown, and malfunctions were excluded for the opacity standard. The same exclusion should be extended to the particulate matter standard, the SO2 standard, and the NOx standard. The definition of startup/shutdown, which was included in I.A.1, clearly states that both the Spray Dryer Absorbers (SDAs), as well as the baghouse, may not be placed into operation until certain safe operating conditions are reached. Until the baghouse is in full operation, we could exceed the emissions of particulates, as well as the opacity, during the periods of startup/shutdown. Similarly, until the SDAs are placed in service, the SO2 emission standard could be exceeded. With regard to NOx, similar boilersafe operating conditions must be reached before the combustion zone can be controlled to minimize the NOx emissions which could be exceeded during the startup period.

The EPA guidance memorandum of February 15, 1983, which was supplied with our comments of September 21, 1998, clearly supports our position.

In addition, the exclusion is also provided under 40 CFR 60.8.(c) which states in part: "Operations during periods of startup, shutdown, and malfunction shall not constitute representative conditions for the purpose of a performance test nor shall emissions in excess of the level of the applicable emission limit during periods of startup, shutdown, and malfunction be considered a violation of the applicable emission limit unless otherwise specified in the applicable standard."

TEP very strongly requests that the exception in I.A.1 for opacity during the periods of startup/shutdown and/or malfunctions be extended to cover the particulate matter under I.A.2, the SO2 standard under I.A.3 and the NOx standard under I.A.4.

Response: The changes have been made.

Comment 3. *Section I.A.3.a and I.A.4*
The underlying requirement R18-2-306.01 should be deleted for these standards. That regulation was not in existence in 1977 at the time that the standard was established in EPA's Approval to Construct of December 21, 1977. Further, the standard was set through PSD, and therefore is not a voluntary emission limitation.

Response: The changes have been made.

Comment 4. *Section I.A.6.*
For this and several other conditions in the permit, ADEQ cites R18-2-306(A)(2) as the basis for the requirement. R18-2-306(A)(2) provides in part that the permit must specify and reference the origin of and authority for each term and condition in the permit. While this regulation establishes the need to specify the source of terms and conditions, it does not itself constitute the origin of and authority for any term or condition. Consequently, it cannot be used in the manner employed by ADEQ in the proposed permit, i.e., as a source for the particular requirement listed. Please provide the proper regulatory basis for this condition.

Response: A.A.C. R18-2-306.A.2 remains as the citation for the condition. The provision requires all emission limitations and standards and standards that assure compliance with applicable requirements to be included in the operating permit.

Comment 5. *Section I.B.1.*
This paragraph is objectionable for the reason that it establishes an opacity standard of 15%, and cites as the regulatory basis R18-2-724(J). While that provision does require reports if the opacity exceeds 15%, neither that provision nor the remaining portions of R18-2-724 establish 15% as the opacity standard for the equipment subject to the rule.

Response: The 15% reporting requirement has been interpreted to establish an emission standard. ADEQ has been consistently applying this policy. Suggested change has not been made.

Comment 6. *Section I.B.5.a.*
For the reasons given in Comment 5 above, R18-2-306(A)(2) is not a proper origin of/authority for this condition. Please provide the proper regulatory basis for this condition.

Response: A.A.C. R18-2-306(A)(2) is the most appropriate citation for this permit condition.

Comment 7. *Section I.C*
As stated in our comments of September 21, 1998, during periods of high winds, it is practically impossible to control fugitive dust which may exceed the 20% opacity. TEP will utilize reasonable precaution during these periods to minimize fugitive dust, including reduced activity on and around the coal pile, but nonetheless may not be able to avoid dusting which may exhibit opacity greater than 20%. If the 25mph wind speed exclusion may not be appropriate, there must be some form of language which excludes these periods as being beyond our control to meet this standard. TEP would

be happy to discuss this further to arrive at a reasonable exclusion.

Response: Since there is no regulatory basis for the requested exclusion, no change will be made.

Comment 8. *Section I.D.2.*
R18-2-730(A)(1) is not a proper applicable requirement for the lime handling equipment. By its very terms, R18-2-730(A) does not apply to a source which is otherwise subject to standards of performance under Article 7, 9 or 11. The Springerville Generating Station is subject to numerous standards of performance under Articles 7, 9 and 11. It is specifically noted that lime handling is subject to R18-2-702(B)(1).

Response: The regulations in Article 7 were designed to regulate air pollutant emitting industrial *equipment* which are not covered by the NSPS/NESHAP programs. AAC R18-2-702(A) states that the provisions of Article 7 apply to "existing sources". R18-2-101(38) defines an *"existing source"* as *a source that does not have an applicable new source performance standard under Article 9.* In the Article 7 and NSPS contexts, "source" has a meaning that is unique to these programs. This meaning is different from the meaning that the term "stationary source", (or "source") has when it is used in the context of other air programs [e.g. AAC R18-2-101(104) which defines a "source" from the permitting perspective].

The Arizona Revised Statutes (ARS), which provide the statutory authority, for AAC Title 18, Chapter 2 contain a definition for "stationary source" that anticipates the usage of this phrase to refer to both individual emissions units, and aggregation of such units. These definitions are reproduced below :

"Stationary source" means any facility, building, equipment, device or machine that operates at a fixed location and that emits or generates air contaminants [see ARS 49-401.01(31)].

"Building", "structure", "facility", or "installation" means all of the pollutant emitting activities which belong to the same industrial grouping, are located on one or more contiguous or adjacent properties, and are under the control of the same person or persons under common control except the activities of any vessel. Pollutant-emitting activities shall be considered as part of the same industrial grouping if they belong to the same major group which has the same two digit code, as described in the standard industrial classification manual, 1972, as amended by the 1977 supplement [see ARS 49-401-.01(6)].

The statutory definition thus includes aggregations of units (by defining the words "building", and "facility" as aggregations), and individual units (by using the words "equipment", "device", and "machine").

The preceding paragraphs indicate that the AAC contains different definitions for "stationary source", and "source". The meaning of this phrase/word is not fixed throughout the AAC, and the final meaning of the phrase/word depends on the context in which it is used. These nuances of meaning are present in the definitions provided by the Clean Air Act and the resulting Federal programs. The usage of "stationary source"/"source" is different and unique in all of the following programs (i) NSR, (ii) NSPS, (iii) MACT/NESHAP, and (iv) Title V.

In outlining the permitting obligations of IGS, AAC R18-2-101(104) is the applicable definition. In deriving the applicable emission standards, AAC R18-2-101(38), in conjunction with the NSPS definition for "source", is the applicable definition.

The cooling tower, lime handling, and flyash silo are emission units distinct from the boilers and other on-site equipment. The effluent from the lime handling, flyash silo and cooling towers are clearly independent air polluting activities. Since there are no specific Article 9, Article 7, or Article 11 standards for these units, the requirements of R18-2-730(A) are satisfied, and the standards in R18-2-730 are applicable to the flyash silo, lime handling, and cooling towers at SGS.

Comment 9. *Section I.E.2.*
For the reasons given in Comment 8 above, R18-2-730(A)(1) is not a proper applicable requirement for the flyash handling equipment. It is noted that the flyash handling operation is subject to the opacity standard from R18-2-702(B)(1).

Response: See response to Attachment B : Comment 8

Comment 10: *Section I.F.2.*
For the reasons given in Comment 8 above, R18-2-730(A)(1) is not a proper applicable requirement for the cooling towers. It is noted that the cooling towers are subject to the 40% opacity standard set out in R18-2-702(B)(1).

Response: See response to Attachment B : Comment 8

Comment 11. *Section I.G.1.b.*
Although this paragraph has been revised by ADEQ, it still does not accurately reflect the language set forth in R18-2-605 and R18-606. The language in the permit condition can reasonably be interpreted to require use of all of the control measures listed in I.G.1.b(1)-(8), rather than allowing the Permittee to select from the listed control measures or to use a different measure. The inconsistency could be cured by revising the lead-in phrase to read: "Permittee shall employ one or more of the following reasonable precautions to prevent excessive amounts of particulate matter from becoming airborne . . ."

Response: Per comment, the change has been made.

Comment 12. *Section II.A.1.*
The language in this condition could be interpreted to require TEP to operate all four baghouses even if one or both units are operating at a reduced load. For clarification purposes, it is recommended that the language four (4) Joy baghouses be revised to the Joy baghouses.

Response: The requested change has been made.

Comment 13. *Section II.B.3.*
For the reasons given in Comment 5 above, R18-2-306(A)(2) is not a proper origin of/authority for this requirement. Please provide the proper regulatory basis for this condition.

Response: See response to Attachment B : Comment 6

Comment 14. *Section II.C.*
For the reasons given in Comment 5 above, R18-2-306(A)(2) is not a proper origin of/authority for this requirement. Please provide the proper regulatory basis for this condition.

Response: See response to Attachment B : Comment 6

Comment 15. *Section II.D.1.*
For the reasons given in Comment 5 above, R18-2-306(A)(2) is not a proper origin of authority for this requirement.

Response: See response to Attachment B : Comment 6

Comment 16. *Section II.D.2.*
For the reasons given in Comment 5 above, R18-2-306(A)(2) is not a proper origin of/authority for this requirement. Please provide the proper regulatory basis for this condition.

Response: See response to Attachment B : Comment 6

Comment 17. *Section III.D.2.*
A regulatory basis is needed for this provision. The proper regulatory citation would appear to be R18-2-306(A)(3)(b).

Response: The change has been made.

Comment 18. *Section III.D.3.a.*
The reference given in this condition in the fifth line to "Section III.D.3.c" is probably intended to be "Section III.D.3.b."

Response: The correction has been made.

Comment 19. *Section III.D.3.a.(1)*
As explained in comment 1 above, 40 CFR 60 (g)(1) provides for the exclusion of one 6 minute average per hour of up to 27% opacity from the reporting requirements. This exclusion should be included in this section.

Response: As explained in response to comment 1 above, the suggested change will no be made.

Comment 20. *Section III.D.3.c*
The reference given in this section in the second line to "section XII.B" should probably be changed to "XII.A". These type of exceedences are covered under XII.A and, as commented above for Attachment A, these reports should be excluded from the requirements of XII.B to avoid duplication of reporting as well as the duplicative timing applicability for reporting under XII.A.1.a. and that under XII.B.2.

Response: The phrase "excess emissions" as defined by in AAC R18-2-101(37) refers to exceedances measured by a compliance test. Therefore, the data provided by the monitors at TEP-SGS are not "excess emissions" as defined in AAC R18-2-101(37). The reference given in this section is correct. No change will be made.

Comment 21. *Section III.F*
A regulatory basis is needed for this provision. The proper regulatory citation would appear to be R18-2-306(A)(3)(b).

Response: The change has been made.

Comment 22. *Section III.F.3*
Add the words "to the extent possible" after "Permittee shall" in the first line. This is necessary because there may be reasons beyond the operator control, such as high winds, that no adjustments or repairs can be made or ever required in order to keep the opacity at or below 20%.

Response: Permittee must comply with the 20% opacity standard all the times. If due to a reasonably unforeseeable event beyond the control of the source, the increases in emissions are attributable to the emergency. This is already covered in the emergency provision. Therefore, the requested change will not be made.

Comment 23. *Section III.F.3. (2)*
The reference to "section XII.A" should probably be changed to "XII.B." This type of excess emission is more closely related to permit deviations as defined in section XII.B of Attachment A and should be reported in accordance to that section instead of XII.A.

Response: If a Method 9 observation indicates an opacity greater than 40 %, the event is an "excess emission" as per AAC 18-2-101(37). The reference given in this section is correct. No change will be made.

Comment 24. *Section III.G.c. (2)*
The reference to "section XII.A" should probably be changed to "XII.B." This type of excess emission is more closely related to permit deviations as defined in section XII.B of Attachment A and should be reported in accordance to that section instead of XII.A.

Response: If a Method 9 observation indicates an opacity greater than 40 %, the event is an "excess emission" as per AAC 18-2-101(37). The reference given in this section is correct. No change will be made.

Comment 25. *Section III.H.3.b*
The reference to "section XII.A" should probably be changed to "XII.B." This type of excess emission is more closely related to permit deviations as defined in section XII.B of Attachment A and should be reported in accordance to that section instead of XII.A.

Response: If a Method 9 observation indicates an opacity greater than 40 %, the event is an "excess emission" as per AAC 18-2-101(37). The reference given in this section is correct. No change will be made.

Comment 26. *Section IV.B.1*
The option of using the equation under 40 CFR 60.46.d.1, where it utilizes Fc factor and CO2 concentration instead of Fd and O2, should be included in this section. SGS utilizes a CO2 monitor in place of O2, and we may want to utilize this option during the compliance testing as well.

Response: Per comment, the option has been given in the permit.

ATTACHMENT "C" - Applicable Requirements

Comment *Attachment "C" fails to list some requirements which appear to apply to the Springerville Generating Station. These include: (1) R18-2-310(C) (Excess Emissions); (2) R18-2-326 (Fees Related to Individual Permits); and (3) R18-2-901.31 (40 C.F.R. Part 60, Subpart Y Coal Preparation Plants). Attachment "C" also lists some requirements which do not apply to the Springerville Generating Station. For the reasons discussed in Comment 6 of the Attachment "B" comments, R18-2-730(A) does not apply to the Springerville Generating Station.*

Response:
(1) Article 3 is a general requirement, R18-2-310(C) is not required to list in the permit.
(2) Article 3 is a general requirement, R18-2-326 is not required to list in the permit.
(3) R18-2-901.31 (40 C.F.R. Part 60, Subpart Y Coal Preparation Plants) has been added to the list.
(4) R18-2-730(A) is applicable rule for the Springerville Generating Station.

Technical Support Document:

Comment: *Section III*

TEP strongly disagrees with your results of PTE listed in your Table 3 of the December

7, 1998 copy of the Technical Support document. We previously submitted comments on September 21, 1998 regarding this Table (Table 4 in the Draft of September 21, 1998) and your PTE results. We also held several discussions regarding this matter, and sent you copies of EPA guidance memorandum on the definition and methodology of applying PTE calculations. The results presented in the new Table 3 are also different than those provided for our comments in the September 17, 1998 draft, Table 4.

Of particular concern are your calculations of PTE for SO2, NOx, PM for the boilers as well as the PM calculations for the coal preparation plant, ash handling and lime handling. As mentioned in our comments of September 21, 1998, the PTE for the above pollutants and sources should be the same as those submitted by TEP in the revised calculations of April 30, 1998.

To the extent that this Table and the listed PTE is used to demonstrate major source applicability then we agree that the source qualifies as a major source requiring Title V permitting. To the extent this Table is used for any other purpose by the agency, or anyone else, TEP very strongly objects to its use and to the accurateness of the values listed under the heading of PTE and the notes listed at the bottom of Table 3.

Response: PTE listed in the table is not an emission limitation of any form. It is for information purposes only. TEP's comment is noted. However, no changes have been made.